James M. Roberts Counsel

212-344-5400 jroberts@schlamstone.com Schlam Stone & Dolan LIP

26 Broadway, New York, NY 10004 Main: 212 344-5400 Fax: 212 344-7677 schlamstone.com

October 9, 2024

VIA ECF

Honorable Lewis A. Kaplan United States District Judge Daniel Patrick Moynihan United States Courthouse 500 Pearl Street New York, NY 10007-1312

> Re: *United States v. Ryan Salame*, 22 Cr. 673 (LAK) Request for Continuance of Self-Surrender Date

Dear Judge Kaplan:

On behalf of Ryan Salame, we respectfully request that the Court continue the date for Mr. Salame to voluntarily surrender to the Bureau of Prisons ("BOP") to begin serving his sentence from Friday, October 11, 2024, to Friday, December 7, 2024, so that he may receive continuing medical treatment deemed necessary by his treating physician to recover from the injuries sustained on or about June 29, 2024. The details of the incident leading to the injuries were set forth in Mr. Salame's request for a continuance dated July 25, 2024, (ECF No. 465), which the Court granted (ECF No. 467).

After the Court granted that continuance,

Correspondence from Mr. Salame's physician attesting to his injuries, the current recommended course of medical care and associated timeframe is attached hereto as Exhibit A.

We have conferred with the Government and the Government opposes this request.

For the foregoing reasons, Mr. Salame respectfully requests that the Court grant Mr. Salame a continuance of his self-surrender date until Friday, December 7, 2024.

Hon. Lewis Kaplan October 9, 2024 Page 2 of 2 Pages

Respectfully submitted,

James M. Roberts

Cc: Douglas E. Grover, Esq.